

*Before the  
Federal Communications Commission  
Washington, DC 20554*

In the Matter of	)	
	)	
Reexamination of the Comparative Standards and	)	MB Docket No. 19-3
Procedures for Licensing Noncommercial	)	
Educational Broadcast Stations and Low Power	)	
FM Stations	)	

**COMMENTS**

The Law Office of Dan J. Alpert hereby submits brief comments with regard to the Commission's proposal for procedures with regard to low-power FM stations.

I am in agreement that the FCC should make very clear to new applicants their obligations with respect to site assurance. NPRM ¶¶ 73-75. However, the FCC should take it one step further. As was the case at one time with full-service broadcast stations, LPFM applicants should state the contact person with whom they dealt in acquiring site assurance. This will allow the FCC and other applicants to check the nature and extent of the reasonable assurance that ostensibly has been acquired.

With regard to other application matters, the FCC should make clear that in designating the use of a local studio for purposes of point enhancement, that reasonable assurance of a specific studio site, *i.e.*, the rental of office space, should *not* be required at the application stage.

Third, the FCC should finally clarify in its instructions what "addresses" it want listed for individual principals – "mailing" address" (which may or may not be the same as the corporate address for an applicant), or "residence" addresses (where the principal actually resides). A great deal of confusion existed in the last LPFM window with respect to this matter. Similarly, the

FCC should make clear in the instructions that valid non-profit incorporation in *any* state is permitted in the filing. This also was a matter of a great deal of unnecessary verbiage and litigation in the last LPFM window.

Finally, I agree that the construction period should be a full three years.

**WHEREFORE**, it is respectfully requested that these Comments be accepted.

Respectfully submitted,

**THE LAW OFFICE OF DAN J.  
ALPERT**

By: \_\_\_\_/Dan J. Alpert/\_\_\_\_

Member

*May 20, 2019*